

Module 8: Training, Awareness, And Competence

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GUIDANCE

Here are two excellent reasons for training employees about environmental management and your EMS:

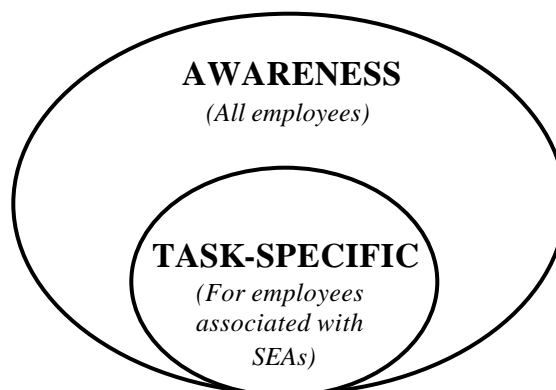
- Every employee can have potential **impacts** on the environment, and
- Any employee can have **good ideas** about how to improve environmental management efforts.

Each person and function within your organization can play a role in environmental management. For this reason, your training program should cast a wide net. Every employee and manager should be aware of the environmental policy, the significant environmental aspects (SEAs) of their work activities, key EMS roles and responsibilities, procedures that apply to their work, and the importance of conformance with EMS requirements. Employees also should understand the **potential consequences** of not following EMS requirements (such as spills, releases, and fines or other penalties).

All personnel should receive appropriate training and support to be competent at their work. Training should be **tailored** to the different needs of various levels or functions in the organization. However, training is just one element of establishing **competence**, which is typically based on a combination of education, training, and experience. For certain jobs (particularly tasks that can cause significant environmental aspects), you should establish criteria to measure the competence of individuals performing those tasks.

Training is needed both in technical work and for general awareness on the part of all employees.

Figure 8-1: Two Areas of EMS Training



Getting Started

Go through the Action Steps listed below and use **Tool 8-1** to help you identify, plan for, and track the training needed to assist in developing and implementing your EMS. You can probably identify some general training needs now, but will need to return to this module to add specific technical training needs that may be identified as you proceed with the EMS. (For example, you will have specific training requirements associated with operational controls for SEAs. Training plans developed during completion of *Module 12: Operational Controls* should be integrated with the training identified in this module.)

Action Steps

1. Identify all job functions that affect the environment. Small companies may wish to identify individuals. Identify who is responsible for employee health and safety.
2. Identify the training and type of training these people currently receive that relates to environmental and health and safety concerns.
3. Determine if EMS education could be integrated with existing training or whether there should be special EMS training, at least in the beginning.
4. Identify training materials or programs available outside your company. Some places to check include:
 - < Trade Associations
 - < Small Business Administration
 - < EPA
 - < State Departments of Environmental Protection
 - < Suppliers
 - < Certified Contractors

L Tip

Don't overlook the need for on-going training when experiencing employee turnover. Be sure that new employees are trained soon after they arrive.

Tool 8-2 provides a sample procedure for environmental training and **Form 8-2** is a sample Training Needs Analysis Form.



TOOLS

Tool 8-1: Training, Awareness & Competence Worksheet

<p>Do we have an existing process for environmental training?</p> <p>If so, does that process need to be revised? In what way(s)?</p>	
<p>What types of training do we provide now (e.g., new employee orientation, contractor training, safety training)?</p> <p>How would EMS-related training fit with our existing training program?</p>	
<p>Who is responsible for training now? Who else might need to be involved within our organization?</p>	
<p>How do we determine training needs now? (List methods used). Are these processes effective?</p>	
<p>Who is responsible for ensuring that employees receive appropriate training? How do we track training to ensure we are on target?</p>	
<p>How do we evaluate training effectiveness? (List methods used, such as course evaluation, post-training testing, behavior observation, etc).</p>	
<p>How do we establish competency, where needed? (List methods used, such as professional certifications).</p> <p>What are the key job functions and activities where we need to ensure environmental competency?</p>	
<p><i>Our next step on training, awareness & competence is to ...</i></p>	

Tool 8-2: Sample Procedure for Environmental Training (Awareness and Task-Specific)

Purpose

To ensure that its employees carry out their duties in as environmentally responsible a manner as possible, [Your Facility's Name] provides all employees with environmental awareness training on environmental issues and provides task-specific training to those employees whose jobs are associated with significant environmental aspects. **Form 8-2** will be used to document [Your Facility's Name]'s training needs analysis.

Procedure

Awareness Training:

1. All new employees receive a 15-minute introduction to the [Your Facility's Name]'s EMS, specifically its environmental policy, significant environmental aspects (SEAs), and environmental objectives. This introduction, which includes an opportunity for the new employees to ask questions about the EMS, is given by the human resources (HR) manager as part of his or her general orientation for new employees. Records of employees who have received this introduction are maintained by the HR department.
2. Each year employees are invited to a company picnic. One of the scheduled events for this picnic is a 15 minute talk by a member of [Your Facility's Name]'s EMS cross functional team (CFT). This person speaks about the environmental accomplishments of [Your Facility's Name], the state of its EMS, and the goals for the coming year. These remarks provide an update to the initial EMS awareness training received by employees.

Task-Specific Training:

3. Using root cause analysis as a tool, the CFT, working in coordination with the appropriate operations managers, identifies the job functions that are associated significantly with each SEA.
4. The CFT, in conjunction with the relevant operations manager, then determines what training employees performing each of these job functions should receive in order to control actual environmental impacts to the greatest possible extent.
5. Operations managers are responsible for ensuring that their employees receive the appropriate task-specific environmental training. Where possible, environmental training is integrated with other types of training (e.g., operational) that employees receive. The HR manager keeps records of the training received by each employee.

Frequency

Awareness training is given to new employees during their first week at [Your Facility's Name]. Task-specific training is given to relevant employees as they take on a new function that is associated with a SEA. Task-specific training is updated, as necessary.

Records

Records of the awareness and task-specific training received by each employee are kept by the Human Resource manager. **Form 8-2** documenting the training needs analysis shall also be maintained by the Human Resource manager.

Form 8-2: Sample Training Needs Analysis Form

[FACILITY NAME]

Date:

Course	Employees Requiring Training	Source of Training	Duration (Hours)	Frequency	Schedule/Status

Form No.:
Issue Date:
Revision Date:

See **Example 8-1** for an example of how to fill out this form.



EXAMPLES

Example 8-1: Training Needs Analysis Form

[FACILITY NAME]

Date:

Course	Employees Requiring Training	Source of Training	Duration (Hours)	Frequency	Schedule/ Status
A/C Refrigeration Servicing (Stationary)	Central Maint. Specific	ABC Training Institute	4 + Pre-study pack	Once	As needed based upon new assignments
HAZWOPER: First Responder Operations Level	Security Team	CDF University	8	Annual	3 rd qtr 2002
Stormwater Poll. Pre. Plan – Certified Operator	Env. Engineer	Your State DEQ	Approx. 8, MI program	Once	Req't has been meet
Environmental Awareness (Addresses awareness requirement of: Air Episode Plan, Asbestos Mgt., Bulk Materials, RCRA - Hazardous Waste: LQG, HAZWOPER 1 st Responder Awareness, PCB Mgt., SPCC, Stormwater Poll. Prev. Plan, Integrated Emergency Response Plan, Toxic Organic Mgt. Plan, Waste Management)	Central Maint. (inc. Cleaners) Central Maint. Specific WWTP Operators Security Env. Engineer Paint Salaried Paint Hourly Medical Material Salaried Material Hourly	{Facility Name} Training Department	2	Annually	3 rd qtr 2002
Material Management – Function Specific (Addresses more detailed function-specific training requirements of: Bulk Materials, RCRA – Hazardous Waste: LQG, SPCC, Stormwater Poll. Prev. Plan, Integrated Emergency Response Plan, Toxic Organic Mgt. Plan, Waste Management)	Central Maint. (inc. Cleaners) Central Maint. Specific WWTP Operators Security Env. Engineer Paint Salaried Paint Hourly Material Salaried Material Hourly	Integrated Waste Manager	2	Annual	4 th qtr 2002
EMS Awareness Training	Facility Wide	{Facility Name} Training Department	Approx. 30 min.	Initially, new hires and when changes in system occur	Jan. 2001 May 1, 2001, then ongoing
EMS Work Instruction (WI) Training	Facility personnel whose work requires use of WIs (determined by Department Supervisor)	{Facility Name} Training Department	1 hour	Initially, when WIs change new hires	Mar. – May 2001
EMS Department Supervisor Training	Department Supervisors	{Facility Name} Training Department	Approx. 1 hour	Initially, new hires	April 2001
ISO 14001 Lead Assessor Training	EMS Coordinator (Env. Engineer)	ABC Training Institute	40 hours	Initially	Completed
ISO 14001 Internal Auditor Training	EMS Audit Team	CDF University	24 hours	Initially, new auditors	Initial training done

Form No.:
Issue Date:
Revision Date: